

***de maximis, inc.***

186 Center Street  
Suite 290  
Clinton, NJ 08809  
(908) 735-9315  
(908) 735-2132 FAX

September 17, 2018

**VIA ELECTRONIC & US MAIL**

Ms. Diane Salkie  
ATTN: Lower Passaic River Remedial Project Manager  
Emergency and Remedial Response Division  
U.S. EPA, Region 2  
290 Broadway, 19th Floor  
New York, New York 10007

**Re: Monthly Progress Report No. 136 – August 2018  
Lower Passaic River Study Area (LPRSA) Remedial Investigation/Feasibility Study  
(RI/FS)  
CERCLA Docket No. 02-2007-2009**

Dear Ms. Salkie:

**de maximis, inc.** is submitting this Monthly Progress Report for the above-captioned project on the behalf of the RI/FS Agreement Settling Parties (Cooperative Parties Group or CPG) pursuant to the Administrative Settlement Agreement and Order on Consent (Settlement Agreement or AOC). The Progress Report satisfies the reporting requirements of Paragraph 42 of said Settlement Agreement. The CPG has revised this Progress Report to address the Region's direction in its September 1, 2015 letter about Section (d).

**(a) Actions which have been taken to comply with this Settlement Agreement during the previous month.**

**Meetings/Conference Calls**

- On August 1, EPA Region 2 (Region 2) and CPG held a teleconference to review Region 2's modeling-related comments on Sections 6, 7, 10 and appendices to the Draft 17-mile Remedial Investigation (RI) Report.
- On August 9, Region 2 and CPG held a teleconference to discuss status of Chemical Fate and Transport (CFT) Model calibration.
- On August 16, Region 2 and CPG held a teleconference to discuss Region 2's comments on the Region's comments on Revision 2 of the Draft Baseline Ecological Risk Assessment (BERA).
- On August 30, Region 2 and CPG held a teleconference to discuss Region 2's August 20, 2018 comments on the Bioaccumulation Model calibration issues.
- On August 30, Region 2 and CPG held a teleconference to discuss plan to transmit updated code/inputs/outputs and review updated water column mass balance results.

**Ms. D. Salkie**  
**LPRSA RI/FS - Progress Report No. 136 – August 2018**  
**September 17, 2018**  
**Page 2 of 4**

### Correspondence

- On August 2, CPG provided Region 2 a summary of CPG's understanding of the results of the August 1 teleconference call on modeling-related comments on the Draft 17-mile RI Report.
- On August 2, CPG provided revised tables for the revised Draft 17-mile BERA to Region 2 for review and discussion and provided a suggested delivery date of Sept 30 for the revised Draft 17-mile BERA.
- On August 7, Region 2 and CPG exchanged emails regarding scheduling a teleconference to discuss the revised tables for the revised Draft 17-mile BERA.
- On August 7, Region 2 provided CPG approval of the revised Bioaccumulation Tissue Data Report submitted January 22, 2016.
- On August 7, CPG provided CFT Model discussion topics to Region 2 for the August 9 teleconference.
- On August 9, CPG provided presentation material from the August 9 CFT Model teleconference to Region 2.
- On August 10, Region 2 and CPG exchanged email regarding limitation for use of the Lower 8-mile FFS Model partitioning coefficient for mercury.
- On August 14, CPG provided a memorandum to Region 2 on the use of modeling in the Upper 9-Mile Interim Action (IA) Feasibility Study (FS).
- On August 15, CPG delivered the July Monthly Progress Report to Region 2.
- On August 17, CPG posted the Newark Bay Study Area (NBSA) Hydrodynamic Sediment Transport (HST) Model Report to the EPA SharePoint site.
- On August 20, Region 2 requested to schedule a teleconference with CPG to discuss Bioaccumulation Model items and a schedule for delivery of the revised Executive Summary and Summary and Findings sections of the revised Draft 17-mile RI Report.
- On August 21, CPG suggested August 30 to Region 2 as a potential date for a teleconference to discuss Bioaccumulation Model items and indicated September 28, 2018 as the delivery date for the revised Draft Executive Summary and Summary/Conclusions sections of the revised Draft 17-mile RI Report.
- On August 27, CPG provided justification for the mercury partitioning value used in the CFT Model to Region 2.
- On August 28, CPG requested clarification from Region 2 to address comments 136 and 147 on the revised Draft 17-mile BERA.
- On August 29, Region 2 confirmed September 6, 2018 for a teleconference with CPG regarding the planned bathymetry survey requested by Region 2.
- On August 30, Region 2 withdrew comments 136 and 147 on the revised Draft 17-mile BERA.
- On August 31, CPG provided CFT Model long-term water column mass balance results to Region 2.

**Ms. D. Salkie**  
**LPRSA RI/FS - Progress Report No. 136 – August 2018**  
**September 17, 2018**  
**Page 3 of 4**

**Work**

- CPG continued work to address Region 2's comments on the revised Draft 17-mile RI Report and Model Appendices.
- CPG continued work to address Region 2's comments on Revision 2 of the Draft 17-mile BERA.
- CPG continued work on calibration of the revised LPR/Newark Bay CFT Model.
- CPG continued work on revision and calibration of the LPR Bioaccumulation Model.
- CPG continued work on revision of Newark Bay Model documentation.

**(b) Results of Sampling and Tests**

- None.

**(c) Work planned for the next two months with schedules relating to the overall project schedule for RI/FS completion**

- CPG will continue work on the revised Draft 17-mile RI Report and Model Appendices in response to Region 2 comments. Appendix P (Bioaccumulation Modeling) has been partially revised, but additional work on calibration issues is required to complete the revision.
- CPG will continue work on Revision 2 of the Draft 17-mile BERA in response to Region 2 comments.
- CPG will continue calibration of the revised LPR/Newark Bay CFT Model and continue to work with HDR to complete the calibration.
- CPG will continue revising and calibrating the LPR Bioaccumulation Model pursuant to Region 2 comments.
- CPG will continue work on Newark Bay Model documentation.
- CPG will continue discussions with Region 2 regarding comments on the Upper 9-mile Interim Action.

**(d) Problems encountered and anticipated problems, actual or anticipated delays, and solutions developed and implemented to address actual or anticipated problems or delays.**

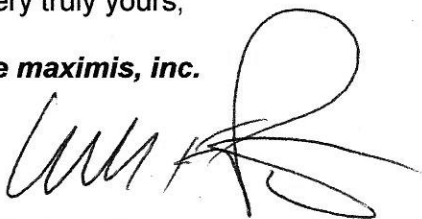
- **Feasibility Study (FS)** – Region 2, NJDEP and the CPG are currently discussing the refocus of the FS to an upper 9 miles Interim Action
- **Other Documents** – Region 2 and CPG are working on finalizing the outstanding documents.

**Ms. D. Salkie**  
**LPRSA RI/FS - Progress Report No. 136 – August 2018**  
**September 17, 2018**  
**Page 4 of 4**

If you have any questions, please contact Rob Law or me at (908) 735-9315.

Very truly yours,

**de maximis, inc.**



Willard Potter  
CPG Project Coordinator

cc: Frances Zizila, EPA Region 2 Office of Regional Counsel  
William Hyatt, CPG Coordinating Counsel  
Lisa Baron, USACE  
Clay Stern, USFWS  
Reyhan Mehran, NOAA  
Jay Nickerson, NJDEP  
Beth Franklin, USACE  
Laura Kelmar, AECOM  
David Marabello, CDM-Smith  
Scott Kirchner, CDM-Smith